

EXHIBIT L

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

THIS DOCUMENT RELATES TO:

TRACK ONE CASES

MDL No. 2804

Hon. Dan Aaron Polster

**CVS HEALTH CORPORATION'S OBJECTIONS AND RESPONSES
TO PLAINTIFFS' FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, CVS Health Corporation ("CVS Health") serves these Objections and Responses to Plaintiffs' First Set of Interrogatories (the "Interrogatories").

RESERVATION OF RIGHTS

1. Personal jurisdiction does not lie over CVS Health in Ohio, and CVS Health has moved to dismiss the Track One cases on this ground (Dkt. No. 495). In making these Objections and Responses, CVS Health does not consent to jurisdiction. Nor does it waive, or intend to waive, its position that the Court lacks personal jurisdiction over it. Because its motion to dismiss for lack of jurisdiction has not been decided, CVS Health provides these Objections and Responses only to comply with the deadline for responding to the Interrogatories and to avoid waiving its rights and objections.

2. These Objections and Responses are made without waiving, or intending to waive, (i) any objections as to the competency, relevancy, materiality, privilege, or admissibility of information or documents produced in response to the Interrogatories; (ii) the right to object

Association of Chain Drug Stores (NACDS), National Association of Attorneys General, Republican Attorney General Association, and Democratic Attorney General Association and Federation of State Medical Boards from January 1, 1990 to present. This includes when the contribution/payment was made, the amount, and to whom it was made.

RESPONSE: CVS Health hereby incorporates its General Objections and Objections to the Definitions and Instructions in their entirety into this response. CVS Health objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and not proportional. CVS Health also objects to this Interrogatory on the ground that it seeks information that is not relevant to any claim or defense in the Track One cases, such as information related to organizations that do not focus on distribution of Controlled Substances.

INTERROGATORY NO. 15: Please Identify each Person, other than a Person intended to be called as an expert witness at trial, who likely has discoverable information that tends to support a position or defense that You have taken or intend to take in this action, and state the subject matter of the information possessed by that Person. This Interrogatory is intended to include but not be limited to any basis or claim You believe in any way limits Your duties as set forth in 21 U.S.C. §823(e), 21 C.F.R. §1301.74(b), 21 C.F.R. §1301.71(a), and/or 21 C.F.R. §1306.04(a). Please also Identify any Documents that would support this position as well as the custodian of said Documents.

RESPONSE: CVS Health hereby incorporates its General Objections and Objections to the Definitions and Instructions in their entirety into this response. CVS Health objects to this Interrogatory on the grounds that it seeks information that is protected by the attorney-client privilege and the attorney work product doctrine. CVS Health objects to this Interrogatory because it is premature at this stage in the litigation. CVS Health also objects to this

Interrogatory on the grounds that persons who are likely to have discoverable information, including current and former employees of Plaintiffs, current and former employees of other Defendants, and current and former employees of third parties such as the Drug Enforcement Administration and other federal, state, and local government agencies, are not subject to the CVS Health's control. CVS Health further objects on the ground that Plaintiffs have not identified the particular conduct – namely, particular Suspicious Orders fulfilled by the CVS Distributors which caused damage to Plaintiffs – that forms the basis of their claims; in the absence of this information, this Interrogatory cannot be answered with any precision or detail. Finally, CVS Health objects to this Interrogatory's request for the identity of documents and the custodians thereof as unduly burdensome and premature.

Subject to and without waiving the foregoing objections, the CVS Distributors identify the persons listed in the response to Interrogatory No. 13. The CVS Distributors also identify the following categories of individuals and entities:

- The Drug Enforcement Administration;
- The Food and Drug Administration;
- The Department of Health & Human Services;
- The Center for Disease Control;
- Centers for Medicare and Medicaid;
- The Ohio Board of Pharmacy;
- The Ohio Department of Medicaid;
- The State Medical Board of Ohio;
- Summit County, and its constituent departments and employees, as well as boards, agencies and commissions;
- Cuyahoga County, and its constituent departments and employees, as well as boards, agencies and commissions;
- The City of Cleveland, and its constituent departments and employees, as well as boards, agencies and commissions;
- Pharmaceutical manufacturers;
- Wholesale drug distributors;
- Hospitals located in the jurisdictions comprising the Track One cases;
- Physicians who prescribed Schedule II Opioids to patients in the jurisdictions comprising the Track One cases; and

- Pharmacists who ordered or dispensed Schedule II Opioids at issue in the Track One cases.
- Treatment centers for addiction to Schedule II Opioids located in the jurisdiction comprising the Track One cases.

The CVS Distributors reserve the right to identify additional individuals who possess discoverable information that tends to support a position or defense that it has taken or intends to take in this action.

INTERROGATORY NO. 16: Describe in detail the corporate history of Your entities, subsidiaries and/or divisions that have, or have had, any role in the manufacture, marketing, sale, dispensing and/or distribution of Opioids or Opioid Products from January 1, 1990 to present, including the dates of acquisition or changes in relationships, and Identify the Persons or entities who hold or have assumed any known or unknown liabilities of each such entity, subsidiary, or division in relation to Opioids or Opioid Products.

RESPONSE: CVS Health hereby incorporates its General Objections and Objections to the Definitions and Instructions in their entirety into this response. CVS Health objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and not proportional. CVS Health also objects to this Interrogatory on the ground that it seeks information that is not relevant to any claim or defense in the Track One cases.

Subject to and without waiving the foregoing objections, the CVS Distributors did not distribute Schedule II Opioids into Cuyahoga and Summit Counties during the Subject Period.

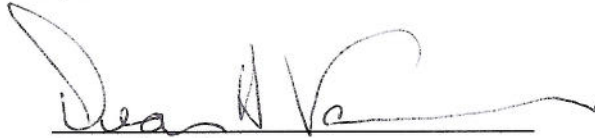
INTERROGATORY NO. 17: Identify each custodian whose records You have searched in order to locate information responsive to these Interrogatories and/or Documents responsive to the Plaintiffs' First Requests for Production.

RESPONSE: CVS Health hereby incorporates its General Objections and Objections to the Definitions and Instructions in their entirety into this response. CVS Health objects to this

VERIFICATION

I have reviewed CVS Health Corporation's Objections and Responses to Plaintiffs' First Set of Interrogatories. The factual information provided in the Responses is true and correct to the best of my knowledge, information, and belief. To the extent that the Responses contain factual information that is not based on my personal knowledge, I am relying on information provided by others with relevant knowledge for the truthfulness and accuracy of the Responses. Subject to these limitations, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief as of this date.

Executed this 18th day of June, 2018.

A handwritten signature in black ink, appearing to read 'Dean Vanelli', is written over a horizontal line.

Dean Vanelli

Senior Director, Supply Chain and Operations Support